MODERNIZATION OF AM BROADCAST REGULATIONS

COMMENTS filed under this GN Docket No. 25-133, by Randal J. Miller, President, Miller Communications, Inc., and Kaskaskia Broadcasting, Inc,. 918 East Park Street, POB 169, Taylorville, IL 62568, e-mail rjm1955@gmail.com.

I am writing in support of the proposed modernization of AM broadcast regulations, particularly regarding the elimination of minimum efficiency limits for AM radiators.

- The current efficiency requirements for AM antennas are outdated and often restrict stations from utilizing solutions that are both practical and effective in real-world environments.
- Instead of mandating minimum efficiency limits, the FCC should allow AM stations to demonstrate adequate coverage of their community of license using a relevant community contour, as is the case for FM stations.
- Stations should be permitted to use any radiator or antenna system that fits their physical site limitations—urbanization, zoning restrictions, and land use issues often make traditional antenna setups infeasible.
- What matters most is whether a station can deliver a reliable signal to its community, not how efficiently the tower converts electrical energy into radio waves. Coverage, not efficiency, should be the regulatory benchmark.

By aligning AM rules more closely with those of FM, the Commission would be taking a meaningful step toward improving service quality, reducing unnecessary burdens on broadcasters, and encouraging technical innovation.